

POLREP No. 6

SITE DESCRIPTION:

Refer to POLREP No. 1 for a discussion of Site conditions and background.

CURRENT ACTIVITIES:

Site removal activities from 07/23/12 through 08/04/12 included:

- Continued excavation of clean overburden from the Bencik property and the Bencik/IDL and Potlatch/IDL transition areas. Started excavation of the LNAPL plume from the Bencik property and Bencik/IDL and Bencik/Potlatch transition areas. Based on field screening, from approximately 0 to 10 feet below ground surface the subsurface soil was considered not contaminated, and from 10 to 20 feet the subsurface soil was considered contaminated.

Encountered significant amount of product in the vicinity of the extraction trenches and recovery wells installed as part of the 1994 Free Product Recovery System (FPRS) and the impermeable vertical wall and collection wells installed as part of the 2000 Corrective Action (CA). Encountered varying sizes and lengths of demolition debris, including concrete, metal, pipe, and asbestos-cement pipe buried in or in close proximity to the extraction trenches installed as part of the 1994 FPRS and 2000 CA.

- Installed approximately 415 feet of temporary cofferdam along the St. Joe River bank. The cofferdam extends approximately 200 feet along the portion of the bank adjacent to the Bencik property and approximately 200 feet along the portion of the bank adjacent to Potlatch property. Once work was started along the riverbank, particularly in and among the riprap, a greater number of product discharges and sheen were observed likely because the riprap, along with product dispersion and dilution, prevented prior observations of the discharges and sheen.

- FHWA ROW: All cleanup activities have been completed. The final approximate quantities are: (JC: please insert final quantity) cubic yards (yd³) of asphalt has been transported off-Site for recycling; (JC: please insert final quantity) yd³ of clean overburden has been excavated and set aside for reuse, and (JC: please insert final quantity) yd³ of contaminated material has been excavated and transported off-Site for disposal.

(JC: Also, please insert the "as of" quantities for the following transition areas)

- FHWA/Bencik Transition Area: As of 07/20/12, approximately 3938 yd³ of clean overburden has been excavated and set aside for reuse, and 1,064 yd³ of contaminated

material has been excavated and placed in the on-Site contaminated soil containment cells pending off-Site disposal.

- FHWA/Potlatch Transition Area: As of 07/20/12, approximately 1,936 yd³ of clean overburden has been excavated and set aside for reuse, and 969 yd³ of contaminated material has been excavated and placed in the on-Site contaminated soil containment cells pending off-Site disposal.

(JC: Also, please insert the “as of” quantities for off-Site disposal)

- As of 07/19/12, approximately 9,090 tons of contaminated materials have been shipped off-Site for disposal at the Waste Management Graham Road Recycling and Disposal Facility, Medical Lake, WA. This quantity of contaminated material equates to 35 to 40 30-ton trucks with trailers per day for a total of 303 trucks to date (which is in addition to the highway reconstruction effort).

(JC: Also, please insert the “as of” quantities for off-Site disposal. Additionally, please provide brief comment re any water or soil analytical data received/collected during the reporting period.)

- Ongoing operation of the temporary water treatment system. To date, approximately 4,620,700 gallons of contaminated groundwater has been treated. Of this amount, approximately 3,678,600 gallons has been discharged to the St. Joe River while 942,100 gallons has been used on-Site for dust suppression. Operational (effluent) samples were collected on 07/05/12, 07/11/12, and 07/18/12 were analyzed for the parameters of concern. None of the required water quality discharge parameters were exceeded. Operational samples will be collected and analyzed for the contaminants of concern on an estimated weekly basis.

- Ongoing maintenance and evaluation of general construction BMPs. To date, there have been no exceedances of surface water quality measured field parameters.

- Ongoing daily routine air quality monitoring at three varying locations and surface water quality monitoring at three locations. To date, there have been no exceedances of applicable air and surface water regulatory criteria.

- Ongoing daily tailgate safety sessions discussing the project, potential hazards, required safety equipment, spill prevention and control BMPs, and anything else personnel should know.

- Continued evaluation of functional baseline project accounting and auditing arrangements and requirements for EPA, START, and ERRS due to multiple parties, settlement agreements, and funding mechanisms.

- Personnel on-Site: EPA – 1; START – 1; ERRS – 22; MDM – 3.

PLANNED REMOVAL ACTIONS:

- Complete reconstruction of the highway (except for paving); return traffic to highway use; deconstruct the temporary bypass roadway.

- Complete the river bank work and deconstruct the cofferdam.

- Ongoing off-Site transportation and disposal of contaminated materials.

- Continue to monitor the water treatment system to ensure it meets the required water quality discharge parameters.

- Continue to evaluate waste acceptance criteria for decontamination and/or disposal of large subsurface debris such as concrete and boulders, and the effectiveness of the proposed field screening methods to be used to determine the extent of excavation.

- Ongoing maintenance and evaluation of BMPs.

- Ongoing routine air quality and surface water quality monitoring.

NEXT STEPS:

The next POLREP will be submitted on or about 18 August 2012, and thereafter on a approximate bi-weekly schedule.

KEY ISSUES:

- Suspended Friday (08/03/12) afternoon delivery of road building materials due to safety concerns for weekend recreational vehicle traffic along the highway and through the Site.

(ERRS & START – Any other key issues worth mentioning?)